

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE HEBREW UNIVERSITY OF JERUSALEM,
YISSUM RESEARCH DEVELOPMENT
COMPANY OF THE HEBREW UNIVERSITY
OF JERUSALEM LTD., BEN-GURION
UNIVERSITY OF THE NEGEV, B.G. NEGEV
TECHNOLOGIES AND APPLICATIONS LTD.,
THE WEIZMANN INSTITUTE OF SCIENCE,
and BAR ILAN UNIVERSITY,

Defendants.

Adv. Pro. No. 21-01190 (CGM)

STIPULATION AND ORDER

WHEREAS, on September 27, 2021, Irving H. Picard, as trustee (“Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-lll, substantively consolidated with the chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, filed a complaint commencing the

above-captioned action (“Complaint”) against The Hebrew University of Jerusalem, Yisum Research Development Company of the Hebrew University of Jerusalem Ltd., Ben-Gurion University of the Negev, B.G. Negev Technologies and Applications Ltd., The Weizmann Institute of Science, and Bar Ilan University (together, “Defendants,” and with the Trustee, the “Parties”), by and through their respective undersigned counsel, state as follows:

WHEREAS, the Defendants filed a motion to dismiss the Complaint on February 10, 2022;

WHEREAS, with permission of the Court and consent of Defendants, the Trustee filed a 66-page opposition to the motion to dismiss on June 15, 2022;

WHEREAS, the deadline for Defendants to file their reply is currently August 15, 2022;

WHEREAS, counsel for the Trustee and counsel for the Defendants have conferred regarding an enlargement of Defendants’ reply and the deadline for submission of the reply; now therefore:

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel, that:

1. Defendants shall file their reply by no later than September 15, 2022. The six defendants may file a single omnibus reply brief that is no longer than 40 pages.

2. The Parties shall jointly seek oral argument on the motion to dismiss at the Court’s convenience after all briefing is complete.

3. As previously stipulated, Counsel for the Defendants accepted service of the Complaint and the Defendants waived any defense in this action based on insufficiency of process or insufficiency of service of process. The Trustee and Defendants otherwise reserve all rights, arguments, objections and defenses they may have, and entry into this Stipulation shall

not impair or otherwise affect any such rights, arguments, objections, and defenses, including, without limitation, challenges to personal jurisdiction or to the jurisdiction of this Court.

4. A signed facsimile or electronic copy of this Stipulation shall be deemed an original.

Dated: July 20, 2022
New York, New York

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Attorneys for Defendants

*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

Dated: July 21, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge